

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC., et al.,)
Plaintiffs,)
v.) 1:12-cv-800-WTL-TAB
J. BRADLEY KING, et al.,)
Defendants.)

DEFENDANTS' PRELIMINARY WITNESS AND EXHIBIT LIST

Defendants respectfully submit their preliminary lists of witnesses and exhibits pursuant to the Case Management Plan approved by the Court on November 13, 2012.

Preliminary Witness List:

1. Trent Deckard, Co-Director, Indiana Election Division
 2. Brad King, Co-Director, Indiana Election Division
 3. Voter registration officials of Indiana counties:
 - a. Ann Alee Turley, Second Deputy, Clerk's Office/Voter Registration, Scott County
 - b. John Rudisill, Voter Registration Deputy, County Clerk's Office
 - c. Heather Butler, Deputy Clerk 4, Crawford County Clerk's Office
 - d. Sarah Topper, Warrick County Clerk
 - e. Debbie Tragesser, Tipton County Clerk
 - f. Karla J. Bauman, Franklin County Clerk
 - g. Debra Hiatt, Warren County Clerk
 - h. Susan M. Kay, Union County Clerk

- i. Roger Purkhiser, Orange County Clerk
- j. Beth Mulry, Brown County Clerk
- k. Marcia R. Moore, Hancock County Clerk
- l. Jessica Firkins, Chief Deputy Clerk, Newton County
- m. Kathlene Grant, Newton County Clerk
- n. Chris Ludwig, First Deputy Administrator, Clark County
- o. Linda Silcott, Voter Registration Board member, St. Joseph County
- p. Terry Coleman, Voter Registration Board member, St. Joseph County
- q. Colleen Hodge, Voter Registration Clerk, Starke County
- r. Thomas A. Massey, Election Board President, Vanderburgh County
- s. David Shaw, Election Board Member, Vanderburgh County
- t. Naomi Saluman, Voter Registration Deputy, Harrison County
- u. Jeannie Hollis, Election Clerk, Martin County
- v. Diane Welch, Voter Registration Clerk, Floyd County
- w. Patty Gritter, Fountain County Clerk
- x. Betty Postalweight, Posey County Clerk
- y. Andrea Miller, Carroll County Clerk
- z. Andrew Wood, Election Deputy, Boone County
- aa. Mary Reid, Election Clerk, White County
- bb. Beth Scheller, Hamilton County Election Board member
- cc. Pat Toschlog, Hamilton County Election Board member
- dd. Carol Schallenberger, Howard County Voter Registration Board member
- ee. Beth Rakestraw, Howard County Voter Registration Board member

- ff. Mary Ann McCoy, Ripley County Clerk
- gg. Will Statom, Delaware County Voter Registration Board member
- hh. Ashley Nichols, Delaware County Voter Registration Board member
- ii. Jennifer Baxter, Deputy Clerk, Dearborn County
- jj. Barry Schust, Allen County Election Board member
- kk. Maye Johnson, Allen County Election Board member
- ll. Shirley Vanmeter, Pike County Clerk
- mm. Tasha L. Foerg, Pulaski County Clerk
- nn. Jason Jacobs, Election Clerk, Clay County
- oo. Bridgette Jarboe, Dubois County Clerk
- pp. Darlene Likens, Madison County Clerk
- qq. Diana Hazlett, Parke County Clerk
- rr. Melinda Sudhoff, Fayette County Clerk
- ss. Diana Hoeing, Election Deputy, Rush County
- tt. Debbie Richardson, Rush County Clerk
- uu. Clerks of remaining Indiana counties

4. Individuals for the purpose of the authentication of exhibits

Preliminary Exhibit List:

- 1. Any affidavits or documents filed in this matter.
- 2. The pleadings in this matter, and all exhibits or attachments thereto.
- 3. Any and all responses to discovery requests.
- 4. Any and all depositions taken in this matter.
- 5. All documents identified in parties' initial disclosures.

6. Any and all documents needed for impeachment and/or rebuttal purposes.
7. All documents identified in Plaintiffs' exhibit lists.
8. 2012 Election Administration Manual
9. 2012 Voter Registration Guidebook
10. Standard Operating Procedures of the Indiana Election Division.
11. "Step by Step Notes" of the Indiana Election Division.
12. NVRA training materials of the Indiana Election Division.

Defendants reserve the right to supplement or amend these lists at any time prior to trial.

Respectfully submitted,

GREGORY F. ZOELLER
Indiana Attorney General
Attorney No. 1958-98

By: /s/ Jefferson S. Garn
Jefferson S. Garn
Deputy Attorney General
Attorney No. 29921-49

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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